

TITLE I, E.S.E.A.

Reviewing Project Applications

HANDBOOK

FOR STATE AND SCHOOL DISTRICT

TITLE I OFFICIALS

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TITLE I, ESEA
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PREFACE

Title I of the Elementary and Secondary Education Act requires local educational agencies to submit applications to the State education agency (SEA) each year describing their proposed programs for educationally deprived children in low income areas.

The application is a necessary document on which the SEA determines opportunities. The SEA is required to review each application to be sure the proposed program meets the requirements of the Title I ESEA Regulations and Program Guides. The application can also be a guide for on site visits which are necessary to assure that the projects are being operated in accordance with the approved application.

This handbook which was designed to help SEA staff members in their review of local applications is made available to local school districts to provide them with the information used by the SEA to determine whether the applicants' proposed program meets requirements.

It identifies and states requirements and suggests questions the SEA should ask in evaluating proposals.

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INTRODUCTION

The handbook states the requirements and questions to be answered. The requirements outline the regulations, program guides, and memoranda an LEA should follow in planning and implementing a Title I program. The questions to be answered are those the SEA might raise in reviewing a local application to be sure it complies with requirements.

The handbook is presented in the following chronological order:

- I. Planning the Program
 - A. Maintaining Effort
 - B. Selecting Eligible School Attendance Areas
 - C. Conducting a Needs Assessment
 - D. Involving Private School Children
 - E. Involving Parents
 - F. Developing the Program
- II. Implementing the Program
 - A. Choosing Location and Staff
 - B. Acquiring Equipment and Constructing Facilities
 - C. Evaluating the Program
 - D. Disseminating Information about the Program
 - E. Reporting on the Program

The regulations cited in the handbook represent the most current draft. Although a few have not received final approval, the assumption is that they will be approved. If they are not, the requirements will, of course, be changed.

For the purpose of this handbook, a project refers to a set of activities designed to meet the needs of educationally deprived children, limited by grade level or particular need. An activity is a set of services having a common function. A program is the total of all projects an LEA operates with Title I funds.

To illustrate the distinction, consider an LEA in the process of developing a Title I program. After assessing the needs of educationally

deprived children in an area with a high concentration of children from low income families, the LEA decides to sponsor two remedial reading projects. One project will serve first through third grade students in a number of schools; the other, children in grades four through six. The needs assessment indicated that these children also required medical attention, so health examinations are built in as part of the projects. Therefore, each project has two major activities--reading instruction, medical examinations. The two projects make up the district's Title I program.

I. PLANNING THE PROGRAM

A. Maintaining Effort

The Requirements:

1. The combined fiscal effort of the SEA and the LEA in providing free public education for the preceding fiscal year must not be less than the combined fiscal effort for that purpose for the second preceding fiscal year. A combined fiscal effort in the preceding fiscal year shall not be deemed to be a reduction from that in the second preceding fiscal year if the reduction in per pupil expenditure in the preceding fiscal year is less than 5%. A reduction in excess of 5% may, however, be accepted in unusual circumstances beyond the applicant's control. 116.45(a) 116.45 (b)
2. There must be assurance that Title I funds will be used to supplement and, to the extent practical, increase the level of funds otherwise available from non-Federal sources. 116.17 (h)
3. Title I funds may not be used to provide services ordinarily provided with State and local funds. Title I services that are similar to those provided with State and local funds must be in addition to those that are ordinarily provided with such funds. 116.17 (h)

The Questions To Be Answered:

1. Is the expenditure of the State and local funds per pupil for the preceding fiscal year as much as or more than that for the second preceding fiscal year? If there is a reduction, does it exceed 5%? If the reduction exceeds 5%, what justification has the applicant presented?
2. Is there evidence that the level of non-Federal funds expended in the Title I area will be reduced during the grant period?
3. Are any of the Title I funds to be used to provide services ordinarily funded with State and local funds? If so, what are the services? Has the LEA demonstrated that these services are different from what is ordinarily provided?

B. Selecting Eligible School Attendance Areas

The Requirements:

- *1. Each project area shall have a high concentration of children from low income families; that is, (1) the estimated percentage of children from low income families residing in a school attendance area or school attendance areas which make up the project area is as high as the percentage of such children residing in the whole of the school district; or (2) the estimated number of the children from low income families residing in an attendance area or attendance areas is as large as the average number of such children residing in the several school attendance areas. If a combination of such methods is used, the number of project areas may not exceed the number that would be designated if only one such method had been used. 116.17 (a) 116.17 (d)
- 2. The project area must be restricted in size in relation to the nature of the project. 116.17 (c)
- *3. In no event may a school attendance area be designated as a project area unless all school attendance areas with a higher number or percentage of children from low income families (depending on the method used to determine the eligibility of that school attendance area) have been so designated. 116.17 (d)
- *4. The LEA may use a whole school district as a project area if there are no wide variances in the concentration of low income children among the several attendance areas in the school district; that is, the variation between areas with the highest and lowest concentration of children from low income families is significantly less than the average variation between such areas in other school districts in the state. 116.17 (d)
- 5. If a project is undertaken by two or more LEAs, the project area with respect to each district must qualify. 116.17 (e)

The Questions To Be Answered:

- 1. What are the numbers and percentages of low income children for each eligible public school attendance area?
- 2. Does the data include low income children residing in the attendance area who are attending private schools? Drop-outs residing in the attendance area? Children residing in institutions for the neglected or delinquent?
- 3. What are the sources of the data?

* Indicates a new section of the regulation or one that has been significantly modified.

4. Are the sources adequate?
5. Have the attendance areas been properly ranked?
6. If the LEA proposes to use an entire school district as the project area, is the variation between the highest and lowest concentration of children from low income families significantly less than the average variation between such areas in the several school districts in the state?
7. If there is more than one LEA undertaking a project, is the project serving children from attendance areas which are eligible for funds in each school district?

C. Conducting a Needs Assessment

The Requirements:

1. The children shall be educationally deprived and residing in the project area or living in institutions for neglected or delinquent children. 116.17(a)
2. No educationally deprived child should be denied services on the ground that they are not from low income families or that they are not attending school at the time. 116.17(f)
3. Projects should be designed to meet the special educational needs of those educationally deprived students who have greatest need of assistance. 116.17(f)
4. There should either be an assessment of the special educational needs of the educationally deprived who would be eligible to receive benefits, or there should be a reference to the assessment contained in a prior application. 116.18(b)
 - (1) In the case of private school children, their needs, the number of them to participate, and the services to be provided shall be determined after consultation with persons knowledgeable of their needs, on a basis comparable to that used in providing for the participation in the program by educationally deprived children enrolled in public schools. 116.19(b)
 - (2) Institutions entitled to funds on the basis of children living in neglected or delinquent institutions shall provide for the special educational needs of those students. 116.18(d)

The Questions To Be Answered:

1. How was the needs assessment conducted within the eligible school attendance areas? What sources were used? Were different methods and procedures found to be necessary for students from different grade levels or with special needs?
2. Have parents, community, and private school officials been involved in the conducting of the needs assessment?
3. Have the needs been categorized so that the priority needs are clearly indicated in terms of grade levels or particular needs?

D. Involving Private School Children

The Requirement:

There shall be a genuine opportunity to participate for the educationally deprived attending private schools who reside in a project area or in a geographical area reasonably coterminous.
116.19 (a)

The Questions To Be Answered:

1. How were private school officials involved in the planning of the program?
2. How many private school children live in the project area?
3. Have the needs of the private school children been adequately stated, and have they been given genuine opportunity to participate in the program?

E. Involving Parents

The Requirments:

- *1. Parents of the children to be served must be consulted in the planning of the project, as well as in its further development and operation. 116.17(o)
- *2. There shall be established a council in which parents of educationally deprived children residing in attendance areas to be served constitute more than a simple majority or there shall be designated an existing organized group in which such parents will constitute more than a simple majority. 116.17(o)
- *3. The parents on the council must be resrepresentative of parents of the educationally deprived children in the areas to be served and of the attendance "areas" to be included in the program. 116-17(o)
- *4. The parents on the council are to be furnished free copies of the act, the State and Federal regulations, and other recent pertinent information. 116.17(o)
- *5. The council should have adequate opportunity to consider information available on the needs and the programs designed to meet these needs and to make recommendations on those needs which should be addressed. 116.17(o)
- *6. The council should review the information available and the evaluations of prior Title I programs and be aware of the performance criteria by which the program is to be judged. 116.17(o)
- *7. Parents in each project area are to be informed and consulted on services to be provided and on ways in which they can assist their children in realizing the benefits those services are intended to provide. 116.17(o)
- *8. There should be prompt response to the complaints and suggestions of parents. 116.17(o)
- *9. All parents of children to be served must have had the opportunity to present their views to the appropriate school personnel and to the parent council concerning the application prior to its submission to the SEA. 116.17(o)
- *10. Each local educational agency is encouraged to form parent councils at each school participating in Title I activities. (Memorandum to Chief State School Officials, October 30, 1970)

The Questions To Be Answered:

1. When was the system-wide council formed? Do parents constitute a majority on the council?
2. What procedures were used for selecting the parents on the Title I council? Are the parents on the council representative of all of the parents?
3. How were parents on the council consulted and involved in the planning of the program?
4. What information did the parents receive prior to the submission of the application?
5. What recommendations did the parents make prior to the submission of the application? Were any adopted?
6. What means did the parents have to register their complaints prior to the submission of the application?
7. How were the complaints of parents resolved?
8. What roles will the parents play during the operation of the project?
9. How many meetings of the parent council were held prior to the submission of the application?
10. How many meeting of the parent council are expected to be held during the grant period?
11. What opportunities did all of the parents have to present their views to the council prior to the completion of the application?
12. Have any parent councils been formed at any of the Title I schools? If so, what are their roles?

F. Developing the Program

The Requirements:

1. The project should be of sufficient size, scope, and quality to give reasonable promise of substantial progress toward meeting the needs of the educationally deprived. 116.18(a)
2. There may be limited participation by educationally deprived children outside the project area provided it does not dilute the effectiveness of the project area. 116.17(a)
3. Instructional services must be tailored to meet one or more of the special educational needs of the educationally deprived in the area to be served. 116.17(g)
- *4. Non-instructional auxiliary services are to be provided only to educationally deprived children receiving instructional services. 116.17(g)
5. Consideration should be given to the provision of Title I services not only during the school year but also during the summer. (Program Guide #44, 4.4)
- *6. In the development of the programs, there must be consideration of suggestions and offers of coordination with other Federal, State, and local programs available to these children. 116.24(a)
7. Consideration should be given to the relationship of the Title I project to the regular school program, as well as to the possibility of modifying that program. (Program Guide #44, 4.1)

The Questions To Be Answered:

1. What are the specific objectives in terms of performance criteria to be accomplished during the grant period for each project?
2. How do the instructional activities in each project relate to these objectives?
3. How do the non-instructional activities in each project relate to these objectives? If any participants in a project will receive support services who are not enrolled in the instructional classes, why is this planned?
4. Was the information available from past Title I projects in the attendance area used in planning each project?
5. How many of the educationally deprived from the attendance areas with the highest concentration of priority are served?

6. If there are any participants being drawn from outside the attendance area, on what basis did the LEA permit such involvement?
7. What criteria were used in selecting participants for each project?
8. Have both the summer and the academic year been considered in planning the project?
9. Has the LEA considered, and will it coordinate the program with, other Federal, State, and local programs available to the Title I students?
10. What is the relationship of each Title I project to the regular school program? Will any Title I projects result in any modification of the regular school program?

II. IMPLEMENTING THE PROGRAM

A. Choosing Locations and Staffing

The Requirements:

1. Title I activities or services should be offered at locations where the children can best be served. 116.17(a)
2. If private school children residing in the project area are enrolled in schools outside the school district, arrangements may be made with the appropriate local educational agency to provide services. 116.19(a)
3. If there is joint participation by children from private schools, provisions should be included, as necessary, to avoid classes which are separated by the school enrollment or religious affiliation of the children. 116.19(d)
4. The proposed staffing pattern should be appropriate for the activities and services to be provided. Program Guide #44, 5.1
5. Public school personnel may offer services at non-public facilities, if such services are not normally given by the private school and provided the LEA maintains administrative direction and control of the services. 116.19(e)
6. Private school teachers should be paid only for services performed outside their regular hours of duty which are under public supervision and control. 116.19(e)
7. In-service training should be geared specifically to the requirements of the Title I project and to the needs of the Title I staff. Program Guide #44, 5.2
8. If the project involves the use of education aides, the LEA must provide a coordinated program for joint training of the aides and the professional staff they will assist. 116.17(m)
9. Parents of participating children, volunteers, and persons in the community with special skills should be considered in the selection of staff. Program Guide #44, 5.1
10. There may be bonus pay for teachers integrally involved with a Title I project in a limited number of schools in the school district that have the highest concentration of children from low income families. 116.17(p)

- (1) It must be reasonable in amount, deemed sufficiently substantial to attract to, or retain at, such schools teachers best qualified to help meet the children's special educational needs. 116.17(p)
- (2) The LEA must demonstrate that its regular salary scale has not attracted or retained teachers of high caliber at these schools. 116.17(p)

The Questions To Be Answered:

1. What are the locations of each major activity in each project?
2. Are these locations most easily accessible to the participants? Are the private school children to be served in each project adequately served in these locations?
3. Are any special arrangements being made for children going to a private school outside the project area?
4. What are the staff positions in each project, professional and paraprofessional? Does the staffing appear adequate and appropriate for carrying out the projects?
5. What is the expected ethnic/racial breakdown of the staff in each project?
6. If there are volunteers in a project, how will their duties be related to those of the paid staff? What type of training will be provided for these volunteers?
7. How were parents of participating children, volunteers, and persons in the community informed about staff positions in the projects?
8. What in-service training will take place for the staff, professional and paraprofessional, in each project? How will it be related to the project's objectives? the needs of the Title I staff?
9. If bonus pay is to be paid in the project, how many teachers will receive the bonus pay? What percentage of the total faculty in the school does this represent? At what school will each of the teachers to receive bonus pay teach? How much is the bonus to be paid to each teacher? How was the amount determined? How will the LEA recruit and hire teachers who will receive bonus pay? What in-service training will be provided to the teachers receiving the bonus pay? How will the effectiveness of the bonus pay be evaluated?

B. Acquiring Equipment and Constructing Facilities

The Requirements:

- *1. The acquisition of equipment or the construction or remodeling of school facilities may be done only to the extent necessary for assuring the success of the project. 116.17(i)
2. The equipment must not otherwise be available. Program Guide #44, 5.6
3. The LEA should train staff members to use the equipment. Program Guide #44, 5.6
4. Administrative control over property acquired with Title I funds rests with the public agency. 116.20(a)
5. There may be no use of equipment, other than of mobile or portable equipment, on private school premises or the construction of private school facilities. 116.19(e)
6. In certain cases, equipment may be placed in private school premises for a limited period of time, but the public agency must keep records of and account for the equipment. The equipment must be used solely for the purpose of the project. 116.20(b)
7. The LEA must show it cannot provide the facilities which need to be constructed. Program Guide #44, 5.7
8. Construction must not cause, or tend to maintain, the cultural or linguistic isolation of children. 116.21(f)
9. The LEA, in deciding to construct facilities, should show that it is necessary to bring the children together at locations where they can be served effectively. Program Guide #44, 5.7
10. Construction of school facilities must meet the requirements in regard to labor standards and overall State construction planning. 116.21(a) and 116.21(c)

The Questions To Be Answered:

1. What equipment will be used in Title I projects? In what projects?
2. How will the equipment be used in the Title I program? How will equipment previously purchased for which the LEA is accountable either be used in the program or be otherwise dealt with?

3. Why is the equipment necessary to achieve the project's objectives?
Can it be obtained elsewhere?
4. Has the LEA assured that it will administratively control all equipment?
5. Has the LEA assured that it will keep records of and account for all equipment purchased with Title I funds?
6. Has the LEA assured that all construction contracts have been negotiated according to the approved State and local constructional procedures?
7. If there is any construction to take place in a project, where will it take place? For what purposes will constructed facilities be used? Why are the facilities to be constructed necessary for the services of the project?
8. Has the LEA assured that equipment purchase procedures are in accordance with approved State and local procedures?
9. Has the LEA assured that the labor standards and the overall State construction policies have been met?
10. Has the LEA assured that all contracts shall go to the qualified bidder making the lowest bid unless one or more items are covered by an alternative procedure?

C. Evaluating the Program

The Requirements:

- *1. There must be at least an annual evaluation of the program on how it is meeting the educational needs of the children, including reference to appropriate performance criteria and the instruments and methods to be used to measure objectively changes in the educational achievement of the children who will participate in the program. 116.22(a)
2. The measurement of educational achievement shall include the measuring or estimating of educational deprivation of those children who will participate in the program and the comparing, at least annually, of the educational achievement of participating children with some objective or norm. 116.22(b)
3. Evaluation should be extended to the private school children participating in the project. 116.22(c)
4. There must be sufficient information for the SEA to determine the adequacy of the resources available for evaluation. (Program Guide #44, 6.1)

The Questions To Be Answered:

1. Does the LEA plan to evaluate each project on a continuing basis?
2. What methods and procedures will be used in evaluating the effectiveness of each project? Is the evaluation of each project related to the specific objectives of each project?
3. What is the measurement being used to define educational deprivation for the participating students?
4. How will the educational achievement of the students be measured?
5. Does the evaluation include private school children participating in the program?
6. Who will participate in the evaluation efforts?
7. Does the LEA plan to submit evaluative reports to the SEA during the course of the program, i.e., monthly, quarterly, annually?

D. Disseminating Information about the Program

The Requirements:

- *1. A Title I application shall include special plans for disseminating to parents and to the general public information and pertinent documents related to Title I. 116.17(n)
- *2. Parents and the general public shall have the opportunity to request the reproduction of pertinent documents. 116.17(n)
- 3. There must be methods for reviewing, selecting, and disseminating to teachers and to education administrators significant information on the latest developments and on the most recent experiments in education, so that they will be of use in project planning and operation. 116.25(a)

The Questions To Be Answered:

- 1. What documents and pertinent data will be disseminated to parents and to the general public during the operation of the program?
- 2. What arrangements have been made so that pertinent documents will be reproduced if they are requested by parents or by the general public?
- 3. How will information on educational matters be disseminated to teachers and to other educational administrators within the school district?
- 4. Does the LEA plan to disseminate examples of projects it considers to be successful?

E. Reporting on the Program

The Requirements:

1. The LEA must provide assurance that it will submit to the SEA an annual report and such other reports as the SEA may deem necessary. 116.23(a)
2. In the case of reports relating to performance, the information supplied shall have been developed in accordance with specific performance criteria related to the project's objectives. 116.23(a)
3. The LEA shall keep project and fiscal records and afford access to them in order to verify and to assure the correctness of the reports and the expenditures of Title I funds. 116.23(a)
4. Each State and LEA shall, in addition to keeping a record of all purchases of equipment, maintain a continuing inventory of each item of equipment purchased at a cost of \$300 or more until: (1) a final determination is made by that agency that the item is no longer useful; (2) it is determined to have a residual value of less than \$100; (3) it has been disposed of; or (4) the accountability for the item to the United States has been waived. 116.55(a)
5. The inventory records shall be retained for three years following the period for which they are required. 116.55(b)

The Questions To Be Answered:

1. Has the LEA assured the SEA that it will submit to the SEA at least an annual report developed in accordance with special performance criteria related to project objectives?
2. Has the LEA assured the SEA that it will keep necessary program and fiscal reports?
3. Has the LEA assured the SEA that it will keep a cumulative inventory of equipment purchased under Title I costing at least \$300 until that item has a residual value of less than \$100; has been disposed of; the accountability to the United States has been waived; or a final determination has been made by the LEA that it is no longer useful?
4. Has the LEA assured the SEA that the records of the inventory shall be kept for a period of three years following the period for which it is required?